

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

RYAN BRESLOW, ALEX FINE, and JON  
GORDON,

Plaintiffs,

v.

MARK PHILLIPS and BENJAMIN REED,

Defendants.

Action No.: 23-cv-20727-ALTMAN/Reid

Honorable Roy K. Altman

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MOVEMENTDAO and MARK PHILLIPS,

Counterclaim-Plaintiffs

v.

RYAN BRESLOW, ALEX FINE, and JON  
GORDON,

Counterclaim-Defendants

**STIPULATION TO EXTEND TIME FOR COUNTERCLAIM-DEFENDANTS TO  
RESPOND TO COUNTERCLAIM**

IT IS HEREBY STIPULATED AND AGREED between Counterclaim-Defendants Ryan Breslow, Alex Fine, and Jon Gordon (collectively, “Counterclaim-Defendants”), and Counterclaim-Plaintiffs MovementDAO and Mark Phillips (“Counter-Claim Plaintiffs”) (all collectively, the “Parties”), that Counterclaim-Defendants may have additional time within which to answer or otherwise respond to Counterclaim-Plaintiffs’ Counterclaim.

On April 27, 2023, the Court held a hearing on Plaintiffs’ request for a preliminary injunction. That hearing was not concluded but is scheduled to resume on May 25, 2023. In light of the pending preliminary injunction hearing, and the Parties’ dedicated efforts towards the

same, the Parties agree that Counterclaim-Defendants must serve answers or otherwise respond to Counterclaim-Plaintiffs' Counterclaim within twenty-one (21) days following the parties' closing arguments at the preliminary injunction hearing, or, if there are no closing arguments, following the conclusion of testimony.

This document is being electronically filed through the Court's CM/ECF System. In this regard, counsel for Counterclaim-Defendants hereby attest that (1) the content of this document is acceptable to all persons required to sign the document (2) Counterclaim-Plaintiffs' counsel has agreed to the filing of this document, and (3) a record supporting this agreement is available for inspection or production if so ordered.

Dated: May 12, 2023

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Dated: May 12, 2023

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/s/ Christopher T. Berg

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*Attorneys for Defendants Mark Phillips and  
Benjamin Reed*

SO ORDERED:

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 12th day of May 2023, the foregoing was electronically filed with the Clerk of the Court by using CM/ECF system, which will send a notice of electronic filing to authorized CM/ECF files.

*/s/Jamie Katz*

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Attorney